

SLT:TJS
F.#2012R01342

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ SEP 24 2012 ★

BROOKLYN OFFICE

UNITED STATES OF AMERICA

- against -

ANDREW GOODMAN,

Defendant.

INDICTMENT
CR 12 - 614

(T. 18, U.S.C., §§
2422(b), 2423(a), 2428
and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

BRODIE, J.

THE GRAND JURY CHARGES:

COUNT ONE

(Coercion and Enticement of a Minor to
Engage in Illegal Sexual Activity)

1. In or about and between October 2007 and February 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANDREW GOODMAN using facilities and means of interstate and foreign commerce, to wit: a telephone, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: John Doe, an individual whose identity is known to the Grand Jury, to engage in sexual activity for which a person can be charged with a criminal offense, to wit: criminal sexual assault in the second degree, in violation of Section 130.45 of the New York Penal Law, and

criminal sexual assault in the third degree, in violation of Section 130.40 of the New York Penal Law.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

COUNT TWO

(Transportation of a Minor with Intent to Engage in Illegal Sexual Activity)

2. On or about and between February 13, 2010 and February 15, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANDREW GOODMAN did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: John Doe, in interstate commerce, to wit: from New York to New Jersey, with the intent that John Doe engage in sexual activity for which any person can be charged with a criminal offense, to wit: sexual assault, in violation of Section 2C:14-2(c)(4) of the New Jersey Code of Criminal Justice, and criminal sexual contact, in violation of Section 2C:14-3(b) of the New Jersey Code of Criminal Justice.

(Title 18, United States Code, Sections 2423(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the above-charged offenses, the government, in accordance with Title 18,

United States Code, Section 2428, will seek forfeiture of (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offenses; and (b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any


other property of the defendant up to the value of the
forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title
18, United States Code, Section 2428; Title 21, United States
Code, Section 853(p))

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

Andrew Goodman,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2422(b), 2423(a), 2428 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c).)

A true bill.

W. A. L.

Foreman

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Tyler J. Smith, Assistant United States Attorney, (718) 254-6186